

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

<p>SHEILA PORTER,</p> <p style="text-align: center;">v.</p> <p>ANDREA CABRAL, ET AL.,</p>	<p>Plaintiff,</p> <p>Defendants.</p>	<p style="font-size: 4em; line-height: 1;">}</p> <p>CIVIL ACTION NO. 04-11935-DPW</p>
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MOTION OF GLOBE NEWSPAPER COMPANY, INC. TO MODIFY PROTECTIVE ORDER

Globe Newspaper Company, Inc. (the “Globe”) respectfully moves to intervene in this proceeding for the limited purpose of requesting that the Court modify the Protective Order entered in this case on March 9, 2005. More specifically, the Globe requests that sections 1(b) (vi) and (ix) be stricken from the Protective Order in order to permit public disclosure of testimony concerning the allegations in plaintiff’s complaint. Reduced to essentials, the Globe maintains that because of the public interest in the allegations of this case, the public official and governmental status of three of the defendants, as well as disclosures made in public filings since the Protective Order was entered, good cause does not exist for continued application of the Protective Order to sworn testimony concerning this action.

As further grounds for its motion, the Globe relies on its memorandum of law, filed herewith. *See also Public Citizen v. Liggett Group, Inc.*, 858 F.2d 775, 783-84 (1st Cir. 1988) (media should file motion to intervene as prerequisite to challenging protective order in civil case).

WHEREFORE, Globe Newspaper Company, Inc. respectfully requests that its motion to intervene be allowed and that the Court grant its motion to modify the March 9, 2005 Protective Order.

OF COUNSEL:

David E. McCraw, Esq.
The New York Times Company
229 West 43rd Street
New York, NY 10036
(212) 556-4031

GLOBE NEWSPAPER COMPANY, INC.,

By its attorneys,

/s/Jonathan M. Albano
Jonathan M. Albano, BBO#013850
BINGHAM MCCUTCHEN LLP
150 Federal Street
Boston, MA 02110-1726
(617) 951-8000

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